UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

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UNITED STATES OF AMERICA

- v. -

DANEL GONZALEZ,
a/k/a "Danny,"
a/k/a "Colifresh,"
MIGUEL RAMOS,
a/k/a "Mickey,"
a/k/a "Papi Papi,"
IAN ROSSO,
AMAURY TORRES, and
RAYMOND LOPEZ,

Defendants.

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SEALED SUPERSEDING INDICTMENT

S4 16 Cr. 175 (LGS)

USDC SDNY
DOCUMENT
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COUNT ONE

The Grand Jury charges:

1. From at least in or about March 2015, up to and including in or about February 2016, in the Southern District of New York and elsewhere, DANEL GONZALEZ, a/k/a "Danny," a/k/a "Colifresh," MIGUEL RAMOS, a/k/a "Mickey," a/k/a "Papi Papi," IAN ROSSO, AMAURY TORRES, and RAYMOND LOPEZ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DANEL GONZALEZ, a/k/a "Danny," a/k/a "Colifresh," MIGUEL RAMOS,

a/k/a "Mickey," a/k/a "Papi Papi," IAN ROSSO, AMAURY TORRES, and RAYMOND LOPEZ, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that DANEL GONZALEZ, a/k/a "Danny," a/k/a "Colifresh," MIGUEL RAMOS, a/k/a "Mickey," a/k/a "Papi Papi," IAN ROSSO, AMAURY TORRES, and RAYMOND LOPEZ, the defendants, conspired to distribute and possess with the intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION WITH RESPECT TO COUNT ONE

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, DANEL GONZALEZ, a/k/a "Danny," a/k/a "Colifresh," MIGUEL RAMOS, a/k/a "Mickey," a/k/a "Papi Papi," IAN ROSSO, AMAURY TORRES, and RAYMOND LOPEZ, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violation alleged in Count One of this Indictment and any and all property used or intended to be used in any manner or part to commit or to facilitate the

commission of the violation, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)

FOREPERSON
9/29/16

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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- v. -

DANEL GONZALEZ, et al.,

Defendants.

SEALED SUPERSEDING INDICTMENT

S4 16 Cr. 175 (LGS)

(21 U.S.C. § 846.)

Foreperson. PREET BHARARA
United States Attorney.

9/29/16 Filed Sealed Superseding Indictment
Judge Netburn